REMARKS

Favorable reconsideration and allowance of the claims of the present application are respectfully requested.

Before addressing the substantative grounds of rejection raised in the outstanding Office Action, applicants have incorporated the subject matter of Claim 7 into each of Claims 1, 12 and 18. Thus, Claims 1, 12 and 18 now positively recite the types of photoactive components that are present in the inventive photoresist composition. Since Claim 7 has been incorporated into Claim 1, Claim 7 is redundant and thus applicants have cancelled that claim in this Response.

Applicants respectfully submit that the above amendments to Claims 1, 12 and 18 are fully supported in the present application therefore entry of the amendments is respectfully requested.

In the outstanding Office Action, Claims 1, 6, 10-12, 17 and 18 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 4,221,859 to Fanger et al. ("Fanger et al."). Claims 1, 6-12 17 and 18 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,800,952 to Urano et al. ("Urano et al.").

Concerning the § 102(b) rejections, it is axiomatic that anticipation under § 102 requires that the prior art reference disclose each and every element of the claim to which it is applied. In re King, 801 F.2d, 1324, 1326, 231 USPQ 136, 138 (Fed. Cir. 1986). Thus, there must be no differences between the subject matter of the claim and the disclosure of the prior art reference. Stated another way, the reference must contain within its four corners adequate direction to practice the invention as claimed. The corollary of the rule is equally applicable: Absence from the applied reference of any

claimed element negates anticipation. Kloster Speedsteel AB v. Crucible Inc., 793 F.2d 1565, 1571, 230 USPQ 81, 84 (Fed. Cir. 1986).

Applicants respectfully submit the claims of the present application, as presently amended, are not anticipated by the disclosure of Fanger et al. and Urano et al. Specifically, the applied references do not disclose a photoresist composition that includes a photoactive component that is selected from the group which is recited in amended Claims 1, 12 and 18.

Fanger et al. discloses a photoimageable composition that comprises an aqueous mixture of a water-insoluble resin, a water-soluble binder, a crosslinking agent and a photopolymerization initiator having an alpha-keto ester linkage. Specifically, Fanger et al. discloses using organic acids in a photopolymerization composition as photoinitiators, wherein the species of the photoinitiators include oxalic acid, sodium oxalate, potassium oxalate, lithium oxalate and urea oxalate.

Applicants observe that none of the components disclosed in Fanger et al. include one of applicants' photoactive components as presently recited in amended Claims 1, 12 and 18. Indeed, the Examiner has recognized this patentable distinction since Claim 7, which previously included applicants' list of photoactive components, was not part of the Examiner's anticipation rejection.

In view of the above amendments and remarks, the anticipation rejection citing the disclosure of Fanger et al. has been obviated. Reconsideration and withdrawal of the anticipatory rejection based on the disclosure of Fanger et al. can and should be made.

Urano et al. discloses a photopolymerizable composition for a color filter that includes a photopolymerization initiator system, a compound having at least one

ethylenically unsaturated double bond, a colorant and a phosphoric (meth)acryalte compound and/or an organic carboxylic acid anhydride having a molecular weight of at most 800. Applicants observe that the Examiner relies on Comparative Examples 6 and 9 of Urano et al. for allegedly disclosing applicants' claimed photoresist composition. Comparative Examples 6 and 9 of Urano et al. disclose a composition that includes a photopolymerization initiator system that includes the following three components: 4,4'-bis(dimethylamino)benzophenone (i.e., Michler's ketone), 2,2'-bis(o-chlorophenyl)-4,4',5,5'-tetraphenylbiimidazole and 2-mecaptobenzothiazole. These compositions also include an additive which is one of oxalic acid and phthalic acid.

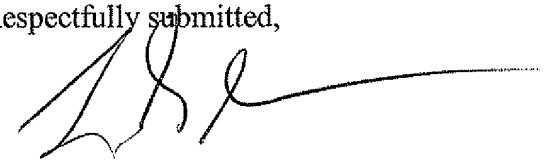
Applicants observe that in the amended claims the list of photoactive components includes Michler's ketone (the nomenclature N,N'-tetramethyl-4,4'-diaminobenzophenone is used in the present claims to denote the Michler's ketone) and 2,2'-bis(o-chlorophenyl)-4,4',5,5'-tetraphenylbiimidazole (the nomenclature 2-(o-chlorophenyl)4,5-diphenylimidazole dimmer is used). The list, however, does not include the thiazole-containing compound which is present in the prior art's photopolymerization initiator system. As such, the claimed composition is not anticipated by the disclosure of Urano et al.

Applicants further observe that in the applied reference Comparative Examples 6 and 9 are used to prove the efficacy of the addition of an organic carboxylic anhydride having a molecular weight of at most 800. In other words, Urano et al. teaches away from utilizing an oxalic acid and phthalic acid in photopolymerizable compositions and therefore does not anticipate the claimed invention.

The foregoing remarks clearly demonstrate that the applied references do not teach each and every aspect of the claimed invention, as required by King and Kloster Speedsteel; therefore the claims of the present application are not anticipated by the disclosures of Fanger et al. and Urano et al. Applicants respectfully submit that the instant § 102 rejections have been obviated and withdrawal thereof is respectfully requested.

Thus, in view of the foregoing amendments and remarks, it is firmly believed that the present case is in condition for allowance, which action is earnestly solicited.

Respectfully submitted,



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